

IN THE UNITED STATES DISTRICT COURT
FOR THE ~~WESTERN~~ MICHIGAN DISTRICT OF WISCONSIN

AT
EN

MICHIGAN
AT
EN

E. Nelson et al

Plaintiff,

Case No.: 2:2022-cv-10918

vs.

Service Towing Inc

et al

Defendant.

MOTION FOR ENTRY OF DEFAULT JUDGMENT

Thorner, NELSON
Plaintiff(s) (name) requests that entry of judgment by default be entered against
Fouts, Scott, Cummings, Shanor, City of Warren
defendant(s) (name) pursuant to Federal Rule of Civil Procedure 55(b). In support of this
request plaintiff(s) relies (rely) upon the record in this case and the affidavit submitted herein.

Dated this 18 day of August, 2009. 2022

AT
EN

B. Bon
Attorney for Plaintiff

Elan Lur

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

AT
EN

AT
EN

E Nelson et al

Plaintiff,

Case No.: 2-2022cv10918

vs.

Service Towing Inc
et al

Defendant.

AFFIDAVIT IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT

THOMAS, Nelson
I, (name), being duly sworn, state as follows:

1. I am the attorney for the plaintiff in the above-entitled action and I am familiar

with the file, records and pleadings in this matter.

2. The summons and complaint were filed on (date). 7-28-22

3. Defendant(s) was (were) served with a copy of the summons and complaint on
7-28-22
(date), as reflected on the docket sheet by the proof of service filed on (date). 7-28-22

4. An answer to the complaint was due on (date). 8-18-22

5. Defendant(s) has (have) failed to appear, plead or otherwise defend within the
time allowed and, therefore, is (are) now in default.

6. Plaintiff requests that the clerk of court enter default against the defendant(s).

I declare under penalty of perjury
Sworn to and subscribed before
me this 18 day of Aug,
2009, 2022

Attorney for Plaintiff

Elaynn

Notary Public

My Commission Expires: _____

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

AT
EN

E Nelson et al

Plaintiff,

Case No.: 2:2022cv10918

vs.

Service Towing Inc et al

Defendant.

AFFIDAVIT IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT JUDGMENT

I, (name), being duly sworn, state as follows:

1. I am the attorney for the plaintiff in the above-entitled action and I am familiar with the file, records and pleadings in this matter.

2. The summons and complaint were served upon the defendant(s) on (date).

3. An answer to the complaint was due on (date). No response was served within the time allowed by law nor has (have) the defendant(s) sought additional time within which to respond, as ordered by Judge

4. The default of defendant(s) was entered on (date). 8-18-22

5. As required by the Servicemembers Civil Relief Act of 2003, I have confirmed that the defendant(s) is (are) not currently in active military service.

6. To my best information and belief, defendant(s) is (are) not an infant or incompetent person.

7. The claim of the plaintiff(s) is for: (Describe in detail the relief sought. If the

\$50 million USD

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

EA
ATT
EN

AT
EN

Nelson et al
Plaintiff,

Case No.: 2:2022cv10918

vs.

Service Towing Inc
Defendant.

CERTIFICATE OF SERVICE

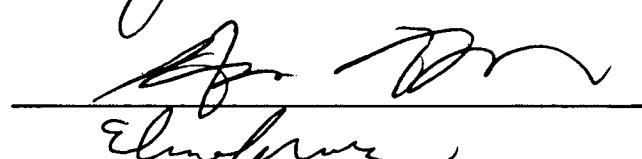
I, (name), hereby certify that I am employed by (name) and am of such age and

discretion as to be competent to serve papers.

I further certify that on this date I caused a copy of the Motion for Entry of Default,
Affidavit in Support of Motion for Entry of Default and proposed Entry of Default to be placed
in a postage-paid envelope addressed to the defendant(s), at the address(es) stated below,
which is (are) the last known address(es) of said defendant(s), and deposited said
envelope(s) in the United States mail.

Addressee: Name(s) and address(es) of defendant(s).

Attn: Barry Moorman
Mark Streetmans, Selina 255 E Brown St LLC
#2200 320 Birmingham MI 48009 2020
Dated this 18 day of Aug , 2022


Elmendorf

IN THE UNITED STATES DISTRICT COURT
EA
FOR THE WESTERN DISTRICT OF WISCONSIN
(EM)
(AT)
MICHIGAN *(AT)*
(CN)

E Nelson et al

Plaintiff,

Case No.: Z: 2022 cv/0918

vs.

Service Towing Inc
et al

Defendant.

CERTIFICATE OF SERVICE

THROWER, Nelson
I, (name), hereby certify that I am employed by (name) and am of such age and discretion

as to be competent to serve papers.

I further certify that on this date I caused a copy of the Motion for Entry of Default Judgment, Affidavit in Support of Motion for Entry of Default Judgment and proposed Default Judgment to be placed in a postage-paid envelope addressed to the defendant(s), at the address(es) stated below, which is (are) the last known address(es) of said defendant(s), and deposited said envelope(s) in the United States mail.

Addressee: Name(s) and address(es) of defendant(s).

Birmingham, MI 48009

*Attny Straetmans,
SELINA 255 E BROWN
St # 370*

Dated this 18 day of Aug

2022 *(AT)*
(CN)

J. P. Bo
Elayda Nelson

dollar amount is for a sum certain, the clerk of court may enter the default judgment. If the dollar amount is not a sum certain and/or additional relief is sought, such as an injunction, a hearing will be set.)

PER 28 USC §1746 I
declare under penalty
of perjury



Amy Brown

Attorney for Plaintiff

Sworn to and subscribed before
me this 18 day of August,
~~2009~~ ~~2022~~ 2022

foregoing is true and correct
Notary Public

My Commission Expires: _____

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

Nelson et al

Plaintiff,

*AT
EN*

Case No.: 2:2022-cv-10918

vs.

Service Towing Inc et al

Defendant.

DEFAULT JUDGMENT

Fouts, Scott, Cummins, City of Warren, Graham

The defendant(s), (name), having failed to appear, plead or otherwise defend in this action, and default having been entered on (date), and counsel for plaintiff(s) having requested judgment against the defaulted defendant(s) and having filed a proper motion and affidavit (declaration) in accordance with Federal Rule of Civil Procedure 55 (a) and (b);

Elizabeth Nelson, Albert Thrower

Judgment is hereby entered in favor of plaintiff(s)/(name) and against defendant(s)
Fouts, Scott, Cummins, Graham, City of Warren
(name), as follows: (describe dollar amounts and relief sought in detail)

Mayor James Fouts

\$50 million USD

Robert Scott

Jointly +

City of Warren

Severally

James Cummins

Gus Graham

Plus interest on the judgment at the legal rate until the judgment is satisfied.

Clerk of Court (if sum certain)
District Judge (in all other instances)

IN THE UNITED STATES DISTRICT COURT
EA Michigan
FOR THE WESTERN DISTRICT OF WISCONSIN

AT
EN

(AT)
(EN)

E Nelson et al

Plaintiff,

Case No.: 2:2022cv10918

vs.

Service Towing Inc

et al

Defendant.

ENTRY OF DEFAULT

Plaintiff(s) (name) requests that the clerk of court enter default against defendant(s) *Gus Goranam, City of Warren, Fouts, Cummins, Robert Scott* (name) pursuant to Federal Rule of Civil Procedure 55(a). It appearing from the record that *City of Warren, Mayor Fouts, James Cummins, Robert Scott*, defendant(s) has (have) failed to appear, plead or otherwise defend, the default of *City Warren, Goranam, Fout, Cummins, Robert Scott* defendant(s) (name) is hereby entered pursuant to Federal Rule of Civil Procedure 55(a).

Dated this 18 day of Aug, 2009. 2022


Peter Oppeneer, Clerk of Court